

costs and interest.

4. That jurisdiction of this Court is proper under 28 U.S.C. §1332, diversity of citizenship.

5. That this action properly lies in this district pursuant to 28 U.S.C. § 1391, because the claim arose in this judicial district.

6. That on February 23, 2022, and at all times relevant hereto, Defendant, Target Corporation, is authorized to do business in the State of Illinois and does business as a retailer in St. Clair County, specifically at its store located at 3400 Green Mount Crossing Drive in Shiloh, Illinois, and invites patrons and others onto its premises to conduct business.

7. That on February 23, 2022, and at all times relevant hereto, the Defendant, Target Corporation, possessed, operated, managed and maintained and controlled or had a duty to possession, operate, manage, maintain and control, both directly and indirectly, individually and through its agents, servants and employees, the premises upon which it conducted business located at 3400 Green Mount Crossing Drive, in the City of Shiloh, Illinois 62269.

8. That Defendant, Target, invited the general public, including Plaintiff, on the premises for the purpose of conducting business activities on the aforementioned premises.

9. That it then and there became and was the duty of Defendant, Target Corporation, individually and by and through its agents, servants and employees, to keep the premises in a reasonably safe condition for Plaintiff and other persons lawfully in and about the premises, and further, not to create or allow any dangerous conditions to exist on or about the premises.

10. On or about February 23, 2022, Plaintiff was an invitee, lawfully on Target's premises at its store located at 3400 Green Mount Crossing Drive, in the City of Shiloh, in St. Clair County, in the State of Illinois and exercising due care for her own safety.

11. That on February 23, 2022, Plaintiff, Kori Logan, was shopping in one of Defendant's store aisles, when she reached for a journal, causing improperly placed dumbbells to fall from the shelf and land on her foot, sustaining severe and permanent injuries

12. That at said time and place, the Defendant, Target, breached the duty it owed to the Plaintiff by committing one or more of the following acts of negligence and/or omissions which directly and proximately caused the incident to occur:

- a. Target, by and through its agents and employees, improperly placed dumbbells higher on the shelf than was reasonable, causing it to fall on the Plaintiff's foot;
- b. Target, by and through its agents and employees, failed to warn invitees, including Plaintiff, of the improperly placed dumbbells;
- c. Target, by and through its agents and employees, failed to properly train its employees how to safely place merchandise onto the shelf;
- d. Target, by and through its agents and employees, failed to manage and maintain premises, specifically the shelves, in a safe condition;
- e. Target, by and through its agents and employees, failed to periodically inspect the shelves for the presence of a hazardous or dangerous condition; and
- f. Target, by and through its agents and employees, permitted the premises to become and remain in an unsafe, defective and/or dangerous condition, which it knew or should have known existed, namely by allowing the dumbbells to be improperly placed on the shelf; and

13. As a direct and proximate result of one or more of the aforementioned acts or omissions of the Defendant, Target, by and through its agents and employees, the Plaintiff, Kori Logan, suffered serious injuries in one or more of the following ways:

- a. She was made sick, sore, lame, disordered and disabled and suffered extensive injuries to her head, body, and limbs, both internally and externally;
- b. She received injuries to her right foot;
- c. She has expended money for necessary medical care, treatment, and services and will be required to expend money for medical care, treatment, and services in the future;

- d. She has suffered disability as a result of her injuries;
- e. She has suffered the loss of a normal life as a result of her injuries;
- f. She has experienced pain and suffering and will be reasonably certain to experience pain and suffering in the future as a result of her injuries;
- g. She has suffered mental, emotional, and psychological injuries and damage; and
- h. She has suffered the loss of wages and will suffer the loss of future earning capacity.

WHEREFORE, the Plaintiff, Kori Logan, prays judgment against the Defendant, Target Corporation, for a fair and just award in excess of Seventy-Five Thousand Dollars (\$75,000.00) plus costs of this suit.

COUNT II
(Res Ipsa Loquitur)
Kori Logan v. Target Corporation

COMES NOW the Plaintiff, Kori Logan, by and through her attorneys, Rich, Rich, Cooksey & Chappell, P.C., and for her cause of action against the Defendant, Target Corporation, respectfully represents unto the Court as follows:

1. On February 23, 2022, and at all times relevant hereto, the Plaintiff, Kori Logan, was domiciled with the intent to remain in the City of Lawrenceville, County of Gwinnett, State of Georgia, and is therefore a citizen of the State of Georgia.

2. On February 23, 2022, and at all times relevant hereto, Defendant, Target Corporation, a corporation, hereinafter (“Target”), was a Minnesota corporation with its principal place of business in Minneapolis, Minnesota, and is therefore a citizen of the State of Minnesota.

3. That the amount in controversy exceeds the sum or value of \$75,000.00, exclusive of costs and interest.

4. That jurisdiction of this Court is proper under 28 U.S.C. §1332, diversity of citizenship.

5. That this action properly lies in this district pursuant to 28 U.S.C. § 1391, because the claim arose in this judicial district.

6. That on February 23, 2022, and at all times relevant hereto, Defendant, Target Corporation, is authorized to do business in the State of Illinois and does business as a retailer in St. Clair County, specifically at its store located at 3400 Green Mount Crossing Drive in Shiloh, Illinois, and invites patrons and others onto its premises to conduct business.

7. That on February 23, 2022, and at all times relevant hereto, the Defendant, Target Corporation, possessed, operated, managed and maintained and controlled or had a duty to possession, operate, manage, maintain and control, both directly and indirectly, individually and through its agents, servants and employees, the premises upon which it conducted business located at 3400 Green Mount Crossing Drive, in the City of Shiloh, Illinois 62269.

8. That on or about February 23, 2022, Defendant, Target Corporation, a corporation, sold goods, including dumbbells, at its premises located at 3400 Green Mount Crossing Drive in Shiloh, Illinois, County of St. Clair, and State of Illinois.

9. That it then and there became and was the duty of Defendant, Target Corporation, individually and by and through its agents, servants and employees, to keep the premises in a reasonably safe condition for Plaintiff and other persons lawfully in and about the premises, and further, not to create or allow any dangerous conditions to exist on or about the premises.

10. That at the aforementioned location, and on or about February 23, 2022, the Defendant, Target Corporation, well knowing its duty in this regard, carelessly and negligently caused and permitted the premises to become and remain in a dangerous condition for persons using said premises, especially patrons, although the Defendant knew, or in the exercise of ordinary and reasonable care should have known, of said dangerous condition.

11. That on February 23, 2022, Plaintiff, Kori Logan, was shopping in one of Defendant's store aisles, when she reached for a journal, causing improperly placed dumbbells to fall from the shelf and land on her foot, sustaining severe and permanent injuries.

12. That said dumbbell was within the management and/or control of Defendant, Target Corporation.

13. That Defendant, by and through its agents and servants, owed a duty to Plaintiff, Kori Logan, to use reasonable care over objects which it had exclusive control.

14. That Defendant, Target, by and through its agents and employees, breached its duty of care towards Plaintiff, Kori Logan, and by its acts of negligence and/or omissions caused her injury to occur which would not have ordinarily occurred absent negligence.

15. That as a direct and proximate results of one of more of the foregoing acts of negligence and/or omissions, the Plaintiff, Kori Logan suffered serious injuries in one or more of the following ways:

- a. She was made sick, sore, lame, disordered and disabled and suffered extensive injuries to her head, body, and limbs, both internally and externally;
- b. She received injuries to her right foot;
- c. She has expended money for necessary medical care, treatment, and services and will be required to expend money for medical care, treatment, and services in the future;
- d. She has suffered disability as a result of her injuries;
- e. She has suffered the loss of a normal life as a result of her injuries;
- f. She has experienced pain and suffering and will be reasonably certain to experience pain and suffering in the future as a result of her injuries;
- g. She has suffered mental, emotional, and psychological injuries and damage; and
- h. She has suffered the loss of wages and will suffer the loss of future earning capacity.

WHEREFORE, the Plaintiff, Kori Logan, prays judgment against the Defendant, Target

Corporation, for a fair and just award in excess of Seventy-Five Thousand Dollars (\$75,000.00) plus costs of this suit.

Respectfully submitted,

/s/ Michelle M. Rich

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